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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA, )  
 )  
Plaintiff, )  
 )  
v. )  
 )  
MOHAMMAD YOUSUF CHAUDHRY, )  
 )  
Defendant. )

No. CR 03-40210 CRB

**UNITED STATES' OPPOSITION TO  
DEFENDANT CHAUDHRY'S REQUEST FOR  
PERMISSION TO TRAVEL**

The United States respectfully opposes the defendant's request for permission to travel to Pakistan. While the defendant has been permitted to travel in the past, the United States believes that the defendant's conviction of multiple offenses, carrying a sentence of up to 10 years of imprisonment, provides him with a greater incentive to flee than previously existed. Moreover, in light of the defendant's mental state, which the Court has found renders him incompetent to be sentenced, the United States believes that it is inappropriate for the Court to allow the defendant to travel unsupervised for a lengthy period of time. The United States believes that the defendant is in need of long-term care and treatment for his mental illness.

Moreover, in light of the Ninth Circuit's ruling, the United States will be requesting that the Court order periodic reevaluations of the defendant to determine if he regains competency so

1 that he may be sentenced. The United States believes that the defendant should not be permitted  
2 to take a lengthy trip to Pakistan while his mental state is still under evaluation.

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5 DATED: May 25, 2012

Respectfully Submitted,

6 MELINDA HAAG  
7 United States Attorney

8 /s

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10 Assistant United States Attorney  
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